



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 11 2019

ACTION MEMORANDUM

SUBJECT: Change in Scope and Ceiling Increase for the Time-Critical Removal Action at the Highland Park Site, Chattanooga, Hamilton County, Tennessee

FROM: Perry Gaughan, On-Scene Coordinator
Emergency Response, Removal and Prevention Branch

THRU: James W. Webster, Ph.D., Chief
Emergency Response, Removal and Prevention Branch

TO: Franklin E. Hill, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed change to the scope of work and ceiling increase for the time-critical removal action at the Highland Park Site (the Site), located in Chattanooga, Hamilton County, Tennessee. The original Action Memorandum was dated May 3, 2018, (attached). A change in scope is warranted to address 17 additional properties identified as having elevated lead levels. The Site continues to pose a threat to public health and the environment pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) that meets the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP) section 300.415(b)(2) criteria for removal actions. The Site is a residential community located near a former foundry area of south Chattanooga, Tennessee. The total project ceiling for this time-critical removal action, if approved, will be \$1,167,400, which will be funded through the Regional Removal Allowance.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: TN000410686
Site ID: B4J4RV03
Type: Time-Critical Removal Action

All information pertaining to Site conditions and background that were identified in the original Action Memorandum of May 3, 2018 remain the same in this amended Action Memorandum.

Additional Assessment Activities

As of December 12th, 2018, the U.S. Environmental Protection Agency Region 4's Remedial Branch has conducted sampling at 166 properties in the Highland Park subdivision in Chattanooga. Of these 166 properties, 99 properties exceeded the site-specific Remedial Goal of 360 parts-per-million (ppm) lead, and 18 properties exceeded 1,200 ppm lead. One of the 18 properties identified as having high lead levels was the focus of the original Action Memorandum dated May 3, 2018. The additional 17 properties with lead levels exceeding 1200 ppm lead is the focus of this change in scope Action Memorandum. The 1,200 ppm lead level meets the Tier 1 removal action criteria for conducting residential soil lead response actions by EPA¹.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

All information pertaining to threats to public health or welfare or the environment, and statutory or regulatory authorities described in the original Action Memorandum dated May 3, 2018, still apply to this amended Action Memorandum.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

This amended Action Memorandum continues response actions for reducing the exposure risk to community members who live at or use the parcels that exceed the Tier 1 criteria for lead. Seventeen additional parcels have been identified as having lead levels exceeding 1,200 ppm. The proposed actions include the following:

- Survey properties to verify current property use;
- Inventory existing plants, grasses, utilities and outbuildings on each property;
- Remove impediments, as allowed, to provide for an appropriate excavation effort;
- Excavate contaminated surface soil to a depth that meets the Remedial Goal²;
- Backfill with clean soil, shape to original contours and lightly compact;

¹ Properties that exceed the Remedial Goal but are below 1,200 ppm will be addressed through the remedial process.

² Excavation generally will not extend into subsurface soil unless clear evidence of source material is encountered.

- Replace or repair any EPA-damaged concrete, utility lines, fencing, etc.;
- Provide temporary on-site storage of contaminated soils generated during removal and decontamination activities, pending further waste characterization and profiling, treatment, reuse and/or recycling;
- Conduct in-situ/ex-situ screening by X-ray fluorescence and/or collect samples for laboratory analysis as necessary;
- Perform on-site treatment of characteristically hazardous waste, if appropriate;
- Arrange for off-site transportation and disposal/treatment of contaminated soil according to applicable regulations and the CERCLA Off-Site Rule;
- Maintain Site security and limit access during implementation of the removal action;
- Conduct all removal actions pursuant to an EPA-approved Health and Safety Plan;
- Temporarily relocate residents if necessary during excavation activity; and
- Re-establish vegetation.

2. Contribution to Remedial Performance

The proposed removal action is warranted to address the threats discussed in Section III, which meet the NCP Section 300.415 (b) (2) removal criteria. The scope of this proposed action is to address the residential parcels that have the highest concentrations of contaminants. At this time, 17 additional parcels will be addressed bringing the total to 18 parcels. The removal action contemplated in this Action Memorandum is consistent with any remedial action.

3. Description of Alternative Technologies

The waste generated from the Site will be characterized and will be properly contained, transported and disposed. There are no known alternative technologies applicable for the treatment or disposal of lead-contaminated soil that will be considered at this Site.

4. Engineering Evaluation/Cost Analysis (EE/CA)

This proposed action is a time-critical removal and does not require an EE/CA.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

In accordance with the NCP at 40 CFR § 300.415(j), on-site removal actions conducted under CERCLA are required to attain ARARs to the extent practicable considering the exigencies of the situation or provide grounds for invoking a CERCLA waiver under Section 121(d)(4). In determining whether compliance with ARARs is practicable, the lead agency may consider appropriate factors including (1) the urgency of the situation; and (2) scope of the removal action to be conducted. Additionally, under 40 CFR § 300.405(g)(3), other

advisories, criteria or guidance may also be considered (To-Be-Considered or TBC) when conducting the removal action.

The EPA Region 4 On-Scene Coordinator (OSC) will coordinate with the Tennessee Department of Environment and Conservation (TDEC) to identify any relevant Site specific ARARs. A letter requesting TDEC identify ARARs was sent on April 4, 2018.

ARARs include only federal and state environmental or facility siting laws/regulations and do not include occupational safety or worker protection requirements. Compliance with Occupational Safety and Health Administration (OSHA) standards is required by 40 CFR § 300.150. ARARs are typically divided into three categories: (1) chemical-specific; (2) location-specific; and (3) action-specific.

Under CERCLA Section 121(e)(1), federal, state or local permits are not required for the portion of any removal or remedial action conducted entirely on-site as defined in 40 CFR § 300.5. See also 40 CFR §§300.400(e)(1) & (2). On-site means the areal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of the response action. On-site response actions must comply, to the extent practicable, with substantive but not administrative requirements of ARARs. Off-site activities such as transportation and disposal of wastes are required to comply with all applicable requirements, including the administrative portions.

As provided in CERCLA Section 121(d)(3) and the Off-site Rule at 40 CFR §300.440 *et seq.* the off-site transfer of any hazardous substance, pollutant or contaminant generated during the response action will be sent to a treatment, storage or disposal facility that is in compliance with applicable federal and state laws and has been approved by the EPA for acceptance of CERCLA waste.

6. Project Schedule

The OSC will be continuing removal activities within the Highland Park subdivision in Chattanooga during February 2019. Eight weeks of removal operations will be required and additional time will be required to complete soil disposal.

B. Estimated Extramural Costs

	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
Regional Removal Allowance Costs			
ERRS	\$ 50,000	765,000	\$815,000
Other Extramural Costs			
START	8,000	75,000	83,000
Subtotal	58,000	840,000	898,000
Contingency (30%)	17,400	252,000	269,400
Total Extramural Costs	\$ 75,400	\$1,092,000	\$1,167,400

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Actual or threatened releases of lead-contaminated soil from this Site, if not addressed by the response action selected in this Action Memorandum, pose a continued imminent and substantial endangerment to public health or welfare or the environment.

VII. OUTSTANDING POLICY ISSUES

No outstanding policy issues have been identified at this time.

VIII. ENFORCEMENT

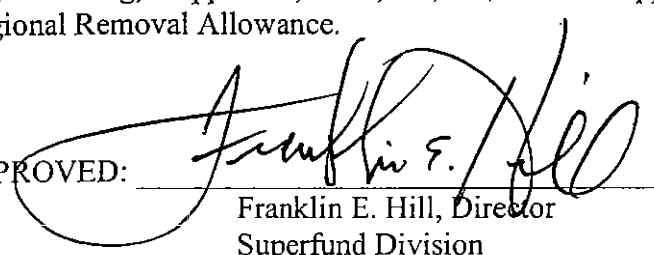
Enforcement activities are ongoing. See Attachment 1, "Enforcement Addendum", for more details.

IX. RECOMMENDATION

This decision document represents a selected removal action for the Highland Park Site in Chattanooga, Hamilton County, Tennessee, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action. I recommend your approval of the proposed removal action. This removal action is anticipated to be fund-lead, with a total project ceiling, if approved, of \$1,167,400, of which approximately \$815,000 will be funded by the Regional Removal Allowance.

APPROVED: _____


Franklin E. Hill, Director
Superfund Division

DATE: _____

2/11/2019

DISAPPROVED: _____

Franklin E. Hill, Director
Superfund Division

DATE: _____

Attachments:

RML Memo, 11/8/2016
Enforcement Addendum
Photographs
Figures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

MAY - 3 2018

ACTION MEMORANDUM

SUBJECT: Request for a Time-Critical Removal Action at the Southside Chattanooga Lead Site – Operable Unit 03 (Highland Park), Chattanooga, Hamilton County, Tennessee

FROM: Perry Gaughan, On-Scene Coordinator
Emergency Response, Removal and Prevention Branch

THRU: James W. Webster, Ph.D., Chief
Emergency Response, Removal and Prevention Branch

TO: Franklin E. Hill, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed time-critical removal action described herein for the Southside Chattanooga Lead Site, Operable Unit 03 (Highland Park), located in Chattanooga, Hamilton County, Tennessee. The Site poses a threat to public health and the environment pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) that meets the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) section 300.415(b)(2) criteria for removal actions. The Site is a residential community located near a former foundry area of south Chattanooga, Tennessee. The total project ceiling for this time-critical removal action, if approved, will be \$75,400 of which \$50,000 will be funded through the Regional Removal Allowance.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: TN000410686
Site ID: B4J4RV03
Type: Time-Critical Removal Action

A. Site Description

1. Removal Site Evaluation

In 2016, Region 4's Site Evaluation Section initiated a Site Inspection (SI) of the Southside Chattanooga Lead Site, in cooperation with the Tennessee Department of Environment and Conservation (TDEC) and the Tennessee Department of Health. The primary purpose of the SI was to follow up on a previous removal action at Read and Mitchell Avenues, to determine if

additional residential areas are similarly impacted by lead-contaminated, spent foundry material. The SI focused on surface soil in seven residential areas and was designed to provide sufficient information to determine the need for a time-critical removal action and whether the Site qualifies for inclusion on the National Priorities List (NPL). The SI included three field events: background sampling (July 2016), SI sample event 1 (October 2016), and SI sample event 2 (January 2017).

During the SI, 285 samples were collected at 236 individual properties (some properties, such as parks or large parcels, had more than one sample). Of the 285 samples, 74 (26%) were within established urban background concentrations for lead, and excluded from further evaluation. Lead levels were at or above the 95% Upper Threshold Limit (UTL) for urban background in 211 of 285 (74%) of the samples collected. Lead levels exceeded 400 parts-per-million (ppm) at 63 of the 236 properties (27% of properties sampled). Lead levels exceed 1,200 ppm in surface soils at seven properties sampled (several of which are multi-family properties). *In vitro*, lead bioaccessibility analysis indicates that the lead present in the contaminated soil is somewhat more bioavailable than the standard default used in the Integrated Exposure Uptake Biokinetic (IEUBK) model for predicting blood-lead levels. The SI also identified properties that were not sampled, but may warrant evaluation, based on proximity to contaminated properties.

Based on the findings of the SI, lead levels in residential soils are most prominent in two of the seven neighborhoods, Jefferson Heights and Southside Gardens. Though not every residential yard was sampled, the SI results identified the highest lead levels in residential yards in Jefferson Heights and Southside Gardens.

As a follow up to the SI, additional sampling was conducted by Region 4's Remedial Branch in August 2017 in which three additional neighborhoods were targeted. Forty samples were collected in Highland Park, Oak Grove and the East Lake areas of Chattanooga to determine the extent of lead contamination from foundry waste in residential parcels. From this sampling event, 10 residential parcels were found to be higher than the remedial target level of 360 ppm lead. Only one garden sample collected in Highland Park exceeded the removal action level of 1,200 ppm at 1,290 ppm lead. Sample results from the entire yard exceeded the remedial target level of 360 ppm lead at 373 ppm. After a review of Site conditions, the Emergency Response, Removal and Prevention Branch (ERRPB) was requested to evaluate whether the residential garden and yard in Highland Park met the criteria as set forth in 40 CFR 300.415(b)(2) for a time-critical removal action.

2. Physical Location

The Southside Chattanooga Lead Site consists of several residential neighborhoods in south Chattanooga, which have been impacted by foundry waste. Historically, foundry waste and spent foundry sand was used as fill material in Southside Chattanooga during residential development. The Highland Park Operable Unit (OU-03) is bounded by Holtzclaw Avenue to the west, East 3rd Street along the north, Dodd Avenue to the east and East Main Street to the south in Chattanooga, Hamilton County, Tennessee. The geographic coordinates (latitude and longitude) assigned to this Site (OU-03) are for the intersection of Bailey and Hawthorne Street. Those coordinates are 35.03391° North latitude by 85.27748° West longitude.

3. Site Characteristics

The land use for this Site (OU-03) is primarily residential; however, it does border some businesses along Main Street and Holtzclaw Avenue to the west. Other parcels along Bailey Avenue and East 3rd Street within Highland Park include churches and businesses. Several parcels along Bailey Avenue also contain abandoned buildings associated with the former Tennessee Temple College.

Although several of the residential yards are well maintained, an equal number are thinly vegetated. Mowing thinly grassed areas potentially frees large amounts of airborne dust, dirt and foundry waste causing possible exposure to contaminants. Some vacant lots are also likely contaminated with foundry waste and serve as potential play areas for children living nearby.

4. Release or threatened release into the environment of a hazardous substance or pollutant or contaminant

Lead above background concentrations has been identified in surface soil at the Site. Lead is a hazardous substance as listed in 40 CFR § 302.4 and defined in Section 101(14) of CERCLA, as amended.

5. NPL Status

The Southside Chattanooga Lead Site was recently proposed to the NPL with concurrence by the State of Tennessee. Again, the Highland Park residential subdivision is one of several residential areas which continues to be assessed by Region 4's Remedial Site Assessment Branch for further remedial action.

6. Maps, pictures and other graphic representations

Pictures and other graphics can be found at <http://epaossc.gov/HighlandPark> and the official Site file.

B. Other Actions to Date

1. Previous Actions

No previous removal actions have taken place within the boundaries of the Highland Park Operable Unit. Region 4 ERRPB did complete a removal action along Read and Mitchell Avenues (the Southside Lead removal site) during 2013 and a removal action at the Jefferson Heights subdivision during 2017 which addressed lead contaminated soils in 95 residential parcels.

2. Current Actions

TDEC continues to monitor all new construction within the Southside communities of Chattanooga and advises contractors on the proper analysis and disposition of foundry waste when it is identified. Currently, TDEC is also overseeing the development and construction of new homes within Highland Park.

C. State and Local Authorities' Roles

1. State and local actions to date

TDEC continues to oversee new home development in the Southside Chattanooga area primarily along Main Street and new development within Highland Park and along East Main Street.

2. Potential for continued state/local response

ERRPB continues to coordinate efforts with TDEC representatives in Chattanooga. ERRPB has also requested assistance from the Hamilton County Health Department and the Tennessee Department of Health in identifying children with elevated blood-lead levels within the study area.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

The lead contamination on-site poses the following threats to public health or welfare as listed in Section 300.415 (b)(2) of the NCP:

Section 300.415 (b)(2)(i) *Actual or potential exposure to nearby human populations or the food chain from hazardous substances pollutants or contaminants;* The elevated lead contamination in surface soils presents a high probability of exposure to persons who live in the community. The concentrations of lead in surface soils exceed the U.S. Environmental Protection Agency's (EPA) Removal Management Levels (RML) for these contaminants. The most likely exposure scenario is via ingestion or inhalation of contaminated soil and soil dusts. Another scenario is ingestion of garden produce that has absorbed the contaminants or has airborne deposition of the contaminants. Lead can affect almost every organ in the body but is especially a concern for young or unborn children. Lead affects the cognitive ability and physical growth of children.

Section 300.415 (b)(2)(iv) *High levels of hazardous substances or pollutants or contaminants in the soils largely at or near the surface, that may migrate;* The analytical results of soil samples collected by the EPA show lead in the top four inches of soil. Exposures may occur when residents conduct routine activities such as cutting the grass, gardening or playing in the yard. Many lawns within the Site are very thinly grassed, and the lawn mowers produce visible emissions of dust/dirt blowing onto neighboring yards or in the street.

Section 300.415 (b)(2)(v) *Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;* Drought conditions may contribute to the potential for airborne migration of surface soils. Wind erosion can lead to migration of fine-grained particles from contaminated surface soil. Also, storm water flow and flooding can cause erosion and subsequent deposition elsewhere of contaminated soil.

Section 300.415 (b)(2)(vii) *The availability of other appropriate federal or state response mechanisms to respond to the release;* There are no other federal agencies available to respond. The State of Tennessee has indicated that it lacks the necessary funds for a removal action of this comprehensive level and therefore is unable to contribute resources to a fund-lead removal action.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site (OU-03), if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The intent of the EPA proposed actions is focused on reducing the exposure risk to the community members who live at or use the parcels that exceed the RMLs for lead. The proposed actions include the following:

- a. Survey properties to verify current property use;
- b. Inventory existing plants, grasses, utilities and outbuildings on each property;
- c. Remove impediments, as allowed, to provide for an appropriate excavation effort;
- d. Excavate the contaminated soil down to a maximum of 12 inches below ground surface where the soil exceeds the remedial action level of 360 ppm lead and or less than 12 inches if such excavation is sufficient to remove the contamination to levels below all RMLs from each property;
- e. Backfill with clean soil, shape to original contours and lightly compact;
- f. Replace or repair any EPA-damaged concrete, utility lines, fencing, etc.;
- g. Provide temporary on-site storage of contaminated soils generated during removal and decontamination activities, pending further waste characterization and profiling, treatment, reuse and/or recycling;
- h. Conduct in-situ/ex-situ screening by X-ray fluorescence and/or collect samples for laboratory analysis as necessary;
- i. Perform on-site treatment of characteristically hazardous waste, if appropriate;
- j. Arrange for off-site transportation and disposal/treatment of contaminated soil according to applicable regulations and the CERCLA Off-Site Rule;
- k. Maintain Site security and limit access during implementation of the removal action;
- l. Conduct all removal actions pursuant to an EPA-approved Health and Safety Plan;

- m. Temporarily relocate residents if necessary during excavation activity; and
- n. Re-establish vegetation.

2. Contribution to Remedial Performance

The proposed removal action is warranted to address the threats discussed in Section III, which meet the NCP Section 300.415 (b) (2) removal criteria. The scope of this proposed action is to address the residential parcels that have the highest concentrations of contaminants. At this time, two residential parcels will be addressed. The removal action contemplated in this Action Memorandum would be consistent with any remedial action.

3. Description of Alternative Technologies

The waste generated from the Site will be characterized and will be properly contained, transported and disposed of. There are no known alternative technologies applicable for the treatment or disposal of lead-contaminated soil that will be considered at this Site.

4. Engineering Evaluation/Cost Analysis (EE/CA)

This proposed action is a time-critical removal and does not require an EE/CA.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

In accordance with the NCP at 40 CFR § 300.415(j), on-site removal actions conducted under CERCLA are required to attain ARARs to the extent practicable considering the exigencies of the situation or provide grounds for invoking a CERCLA waiver under Section 121(d)(4). In determining whether compliance with ARARs is practicable, the lead agency may consider appropriate factors including (1) the urgency of the situation; and (2) scope of the removal action to be conducted. Additionally, under 40 CFR § 300.405(g)(3), other advisories, criteria or guidance may also be considered (To-Be-Considered or TBC) when conducting the removal action.

The EPA Region 4 On-Scene Coordinator will coordinate with TDEC to identify any relevant Site specific ARARs. A letter requesting TDEC identify ARARs was sent on April 4, 2018.

ARARs include only federal and state environmental or facility siting laws/regulations and do not include occupational safety or worker protection requirements. Compliance with Occupational Safety and Health Administration standards is required by 40 CFR § 300.150. ARARs are typically divided into three categories: (1) chemical-specific; (2) location-specific; and (3) action-specific.

Under CERCLA Section 121(e)(1), federal, state or local permits are not required for the portion of any removal or remedial action conducted entirely on-site as defined in 40 CFR § 300.5. See also 40 CFR §§300.400(e)(1) & (2). On-site means the areal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of the response action. On-site response actions must comply, to the

extent practicable, with substantive but not administrative requirements of ARARs. Off-site activities such as transportation and disposal of wastes are required to comply with all applicable requirements, including the administrative portions.

As provided in CERCLA Section 121(d)(3) and the Off-site Rule at 40 CFR §300.440 *et seq.* the off-site transfer of any hazardous substance, pollutant or contaminant generated during the response action will be sent to a treatment, storage or disposal facility that is in compliance with applicable federal and state laws and has been approved by the EPA for acceptance of CERCLA waste.

6. Project Schedule

Initial removal activities related to Site preparation are anticipated to begin within one month of approval of this Action Memorandum and receipt of funding for proposed actions. It is anticipated that once activities begin, this removal action will take approximately three weeks of on-site work to complete. Additional time may be required to complete soil disposal and establish vegetation depending upon weather conditions.

B. Estimated Costs

Extramural Costs:

Regional Removal Allowance Costs:

ERRS	\$ 50,000
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Other Extramural Costs Not Funded from the Regional Allowance:

START	\$ 8,000
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Subtotal, Extramural Costs	\$ 58,000
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Costs Contingency (approx. 30%)	\$ 17,400
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TOTAL EXTRAMURAL COSTS	\$ 75,400
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VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Actual or threatened releases of lead-contaminated soil from this Site (OU-03), if not addressed by the response action selected in this Action Memorandum, pose a continued imminent and substantial endangerment to public health or welfare or the environment.

VII. OUTSTANDING POLICY ISSUES

No outstanding policy issues have been identified at this time.

VIII. ENFORCEMENT

Enforcement activities are ongoing. See Attachment 1, "Enforcement Addendum", for more details.

IX. RECOMMENDATION

This decision document represents a selected removal action for the Highland Park Operable Unit (03) of the Southside Chattanooga Lead Site in Chattanooga, Hamilton County, Tennessee, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action. I recommend your approval of the proposed removal action. This removal action is anticipated to be fund-lead, with a total project ceiling, if approved, of \$75,400 of which approximately \$50,000 will be funded by the Regional Removal Allowance.

APPROVED: _____



Franklin E. Hill, Director
Superfund Division

DATE: _____

5/3/2018

DISAPPROVED: _____

Franklin E. Hill, Director
Superfund Division

DATE: _____

Attachments:

RML Memo, 4/15/2018
Enforcement Addendum
Photographs
Figures

Note: Due to the CONFIDENTIAL nature of the material, the Enforcement Addendum has been withheld. Withheld material is available, for Judicial review only, in the Records Center at EPA Region IV, Atlanta, Georgia.